

FILED  
Clerk's Office  
USDC, Mass.  
Date 7/12/05  
By MR  
Deputy Clerk

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN A. HIRSCH and RONALD W.  
ZOLLA, Individually and as officers,  
directors, and shareholders of ZHL, Inc., and  
ZHL, Inc.

Plaintiffs,

v.

MICHAEL LAMENSDORF and KATHY  
LAMENSDORF, Individually and as  
shareholders of ZHL, Inc.,

Defendants.

Civil Action No. 05-10902-DPW

RECEIPT # 65544  
AMOUNT \$ 50.00  
BY DPTY CLK MR  
DATE 7/12/05

**MOTION FOR ADMISSION PRO HAC VICE OF MICHAEL S. TAAFFE**

Pursuant to Local Rule 83.5.3 of this Court, Matthew E. Miller, a member of the Bar of this Court who is an attorney with the firm of Foley Hoag, LLP, moves for the admission to the Bar of this Court, *pro hac vice*, of Michael S. Taaffe, a partner of the firm of Abel, Band, Russell, Collier, Pitchford & Gordon, Chartered, of Sarasota Florida. As grounds for this Motion, the undersigned counsel respectfully represents the following:

1. Mr. Taaffe is and has been a member in good standing of the Bar of the State of Florida.
2. No disciplinary proceedings or criminal charges have even been instituted against Mr. Taaffe, nor are any disciplinary proceedings pending against Mr. Taaffe as a member of the Bar in any jurisdiction.
3. Mr. Taaffe is familiar with the facts and circumstances of this case.

4. Mr. Taaffe is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. The Affidavit of Michael S. Taaffe in support of this motion is attached hereto as Exhibit "A".

WHEREFORE, the undersigned counsel respectfully moves Mr. Taaffe's admission to practice before this Court *pro hac vice*.

Respectfully submitted,

MICHAEL LAMENSDORF and KATHY  
LAMENSDORF

By their attorneys,

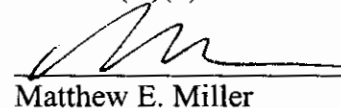


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Dated: July 12, 2005

**CERTIFICATION UNDER LOCAL RULE 7.1(A)(2)**

The parties have met and conferred in a good faith attempt to resolve or narrow the issues presented by this motion, in compliance with Local Rule 7.1(A)(2).

  
Matthew E. Miller

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Defendants.

**AFFIDAVIT OF MICHAEL S. TAAFFE, ESQ.**  
**IN SUPPORT OF MOTION TO ADMIT PRO HAC VICE**

I, MICHAEL S. TAAFFE, Esq., hereby declare as follows:

1. I am and have been a member in good standing of the Bar of the State of Florida.
2. I am a partner at Abel, Band, Russell, Collier, Pitchford & Gordon, Chartered, of Sarasota, Florida, and am counsel to Michael Lamensdorf, individually and as a shareholder of ZHL, Inc., and Kathy Lamensdorf, individually and as a shareholder of ZHL, Inc, Defendants in this case. I am familiar with the facts and circumstances of the case.
3. No disciplinary proceedings or criminal charges have ever been instituted against me, nor are any disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
4. I promise to uphold the high standards of the Bar in this case.
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts

Signed under penalty of perjury.

Dated: July 12<sup>th</sup>, 2005.



MICHAEL S. TAAFE

COMMONWEALTH OF MASSACHUSETTS

Suffolk, SS.

July 12, 2005

Then personally before me the above named MICHAEL S. TAAFE, proved to me through satisfactory evidence of identification, which was driver's license, to be the person whose name is signed on the foregoing instrument, and acknowledged to me that he signed it voluntary for its stated purpose.



Notary Public

My commission expires: 11.15.07